

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

*ALL DIRECT PURCHASER ACTIONS*

*ALL INDIRECT PURCHASER ACTIONS*

**STIPULATION AND [PROPOSED] ORDER  
RE: BRIEFING ON IRICO DEPOSITIONS  
AND TRIAL SCHEDULES**

Judge: Honorable Jon S. Tigar

1 Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”) and Defendants  
2 Irico Group Corporation and Irico Display Devices Co., Ltd. (“Irico” or the “Irico Defendants,”  
3 collectively the “Parties”), by and through the undersigned counsel and pursuant to Federal Rule of  
4 Civil Procedure 16(b)(4) and Civil Local Rule 7-12, hereby stipulate as follows:

5 WHEREAS, on August 11, 2022, the Court ordered that Irico witnesses must appear for  
6 deposition by September 9, 2022 and, should they fail to appear, to submit a 15-page, double-  
7 spaced joint statement on the Parties’ positions on the legal consequences of Irico’s witnesses not  
8 appearing for deposition (ECF No. 6047);

9 WHEREAS, on August 22, 2022, the Court entered the Parties’ Stipulation and Order re:  
10 Irico Depositions, extending the deadline to produce Irico witnesses Wang Zhaojie and Yan  
11 Yunlong to the weeks of September 19, 2022, and September 26, 2022, respectively (ECF No.  
12 6056) (the “Order”), in order to obtain the necessary visas;

13 WHEREAS, Mr. Wang appeared for deposition via videoconference from Macau from  
14 September 20 to September 22, 2022;

15 WHEREAS, Mr. Yan is expected to appear for deposition via videoconference from Macau  
16 beginning on September 27, 2022;

17 WHEREAS, the Irico Defendants previously agreed to produce Irico witness Su Xiaohua  
18 for deposition, and the Court ordered them to do so (*see, e.g.*, January 10, 2022 Order, ECF No.  
19 5980); however, the Irico Defendants have represented that Mr. Su resigned from all Irico-related  
20 companies on May 25, 2022;

21 WHEREAS, the deposition of Mr. Yan will not take place prior to the current September  
22 23, 2022, deadline to file joint statement on the Parties’ positions on the legal consequences of  
23 Irico’s witnesses not appearing for deposition (the “Joint Deposition Statement”);

24 WHEREAS, on September 14, 2022, the Court entered an Order Re: Responses on Trial  
25 Scheduling requiring the parties to meet and confer and submit a joint statement as to the proposed  
26 process for the Irico trials in the DPP and IPP actions on September 30, 2022 (the “Joint Trial  
27 Statement”) (ECF No. 6070); and,  
28

1 WHEREAS, the parties are still considering their respective positions and, in light of the  
2 ongoing depositions, have not yet had an opportunity to meet and confer regarding the Joint Trial  
3 Statement, and agree that a brief, one-week extension of the current deadline is in the best interests  
4 of the Parties and the Court;

5 IT IS HEREBY STIPULATED AND AGREED by and between counsel for DPPs, IPPs,  
6 and the Irico Defendants that good cause exists to modify the deadlines to file the Joint Deposition  
7 Statement and the Joint Trial Statement as follows:

8 1. The September 23, 2022, deadline for the Parties to file their Joint Deposition  
9 Statement is extended to October 26, 2022, 30 days from the expected start of Mr. Yan's  
10 deposition.

11 2. The September 30, 2022, deadline for the Parties to file their Joint Trial Statement is  
12 extended to October 7, 2022.

13 **PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO**  
14 **ORDERED.**

15  
16 Dated: \_\_\_\_\_

17 \_\_\_\_\_  
18 HONORABLE JON S. TIGAR  
19 UNITED STATES DISTRICT JUDGE  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Dated: September 23, 2022

2  
3 /s/ R. Alexander Saveri

4 R. Alexander Saveri (173102)  
5 Geoffrey C. Rushing (126910)  
6 Cadio Zirpoli (179108)  
7 Matthew D. Heaphy (227224)  
8 SAVERI & SAVERI, INC.  
9 706 Sansome Street  
10 San Francisco, CA 94111  
11 Telephone: (415) 217-6810  
12 Facsimile: (415) 217-6813

13 *Lead Counsel for Direct Purchaser Plaintiffs*

14  
15 /s/ Mario N. Alioto

16 Mario N. Alioto (56433)  
17 Joseph M. Patane (72202)  
18 Lauren C. Capurro (241151)  
19 TRUMP, ALIOTO, TRUMP & PRESCOTT  
20 LLP  
21 2001 Union Street, Suite 482  
22 San Francisco, CA 94123  
23 Telephone: 415-563-7200  
24 Facsimile: 415- 346-0679  
25 Email: malioto@tatp.com  
26 jpatane@tatp.com  
27 lauren russell@tatp.com

28 *Lead Counsel for the Indirect Purchaser Plaintiffs*

/s/ John M. Taladay

John M. Taladay (*pro hac vice*)  
Evan J. Werbel (*pro hac vice*)  
Thomas E. Carter (*pro hac vice*)  
Andrew L. Lucarelli (*pro hac vice*)  
BAKER BOTTS LLP  
700 K Street, N.W.  
Washington, D.C. 20001  
(202) 639-7700  
(202) 639-7890 (fax)  
Email: john.taladay@bakerbotts.com  
evan.werbel@bakerbotts.com  
tom.carter@bakerbotts.com  
drew.lucarelli@bakerbotts.com

*Attorneys for Defendants Irico Group Corp.  
and Irico Display Devices Co., Ltd.*

**ATTESTATION**

I, John M. Taladay, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that each of the other Signatories have concurred in the filing of the document.

By: /s/ John M. Taladay  
John M. Taladay